

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION, YOUNGSTOWN**

ANDREW ERDOS, DAVID ANDERSON, and VALLEY VIEW MHP LLC, individually and on behalf of all others similarly situated,	:	CASE NO.: 4:23-cv-00268
Plaintiffs,	:	Judge Benita Y. Pearson
v.	:	Magistrate Judge Amanda M. Knapp
NORFOLK SOUTHERN CORPORATION, NORFOLK SOUTHERN RAILWAY COMPANY, JOHN DOE(S) 1-20, and ABC CORP(S). 1-20.	:	PLAINTIFFS' NOTICE OF STATUS OF JOINT NOTICE REGARDING THE SAMPLING AT THE DERAILMENT SITE FOLLOWING THE HEARING ON THE TEMPORARY RESTRAINING ORDER
Defendants.	:	

Pursuant to the Court's request during the February 27, 2023 hearings on Plaintiffs' Motion for Temporary Restraining Order and Preliminary Injunction, the parties have engaged in discussions regarding sampling at the derailment site. The parties are continuing their discussions and exchange of ideas. The parties need some additional time to come to an agreement but anticipate that a Joint Notice will be filed later today.

Plaintiffs note that they have been coordinating with Plaintiffs' counsel in the following cases: *Feezle, et al., v. Norfolk Southern Railway Co., et al.*, Case No. 4:23-cv-00242-BYP; *Canterbury, et al., v. Norfolk Southern Corp.*, 4:23-cv-00298-BYP; *Battaglia, et al., v. Norfolk Southern Railway Co.*, et al, Case No. 4:23-cv-00303-BYP;¹ and *Fisher, et al. v. Norfolk Southern Corp.*, 4:23-cv-00350-BYP.

¹ During discussions with Plaintiffs' counsel in the *Battaglia* case on the evening of February 27, 2023, Counsel indicated they were not sending any experts to the site this week.

Respectfully submitted,

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*Attorneys for the Plaintiffs and
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**pro hac vice forthcoming*

Certificate of Service

I hereby certify that on February 28, 2023 a copy of foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/ s/ Melanie S. Bailey
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